

EXHIBIT C

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MASSACHUSETTS
3 WESTERN SECTION

4 Singular Computing LLC)
5)
6 vs)
7)
8 Google LLC)
9)

10 19cv12551-FDS

11 June 30, 2021

12 VIDEO HEARING BEFORE: MAGISTRATE JUDGE DONALD L. CABELL.

13 APPEARANCES:

14 On behalf of the plaintiff: Michael Ercolini, Prince
15 Lobel Tye LLP, One International Place, Suite 3700,
 Boston, MA 02110.

16 Brian M. Seeve, McCarter & English, LLP, 265 Franklin
17 Street, Boston, MA 02110.

18 Daniel J. McGonagle, Prince Lobel Tye LLP, One
 International Place, Suite 3700, Boston, MA 02110.

19 On behalf of the defendant: Matthias A. Kamber, Keker, Van
20 Nest & Peters, LLP, 633 Battery Street, San Francisco, CA
 94111.

21 Alice Moran, CSR, RPR, RMR
22 Official Federal Court Reporter
23 United States Courthouse
 300 State Street, Room 303D
 Springfield, MA 01105
 (413)731-0086
 alice.moran@verizon.net

1 so, what is the nature of the objection?

2 ATTORNEY KAMBER: So we haven't had a chance to
3 file our opposition yet, but I'm going to try to do this
4 based on what I know would be in there, Your Honor, and
5 that is the blueprints for how these chips are built is
6 the system Verilog code. That's a hardware description
7 language that defines how the circuits look.

8 We have made that available for inspection since
9 November and I believe they have had multiple
10 opportunities to look at that and have looked at it.
11 Those are the blueprints.

12 From those blueprints, Google created these
13 microarchitecture specifications. Sometimes it goes the
14 other way around but the engineer who was the lead
15 architect can explain and has a declaration ready that
16 says in this particular case we designed the chip first
17 and we documented it after.

18 So there is no necessarily hard and fast thing that
19 got sent to a manufacturer that is the ground truth. The
20 ground truth is the system Verilog code. There are
21 different drafts of this microarchitecture specification
22 and we have provided -- in fact, I think we provided this
23 as well back in November -- the thing that -- the
24 "closest" thing to final that we have. It might --

25 THE COURT: I get that. I mean, well, I'm